Case 2019AP001404

STATE OF WISCONSIN IN SUPREME COURT

Case No. 2019AP1404-CR

STATE OF WISCONSIN,

Plaintiff-Respondent,

v.

GEORGE STEVEN BURCH, Defendant-Appellant.

MOTION TO EXPAND WORD COUNT LIMIT

Please take notice that the defendant, George S. Burch, by his attorney, Ana L. Babcock, hereby moves this Court, pursuant to Wis. Stat. § 809.19(8)(c)(2), for an order that the appellant's reply brief may exceed the 3,000 word limit by 1,000 words; that is, an order that the appellant's reply brief is limited to 4,000 words. As grounds for and in support of this motion, the defendant states the following:

This matter involves two complex issues, the first of which presents several novel questions and involves a myriad of cases from other jurisdictions. Given the factual and legal complexity, an expansion of the word limit is necessary to fully develop these issues.

The court of appeals granted an expansion to 4,000 words for the reply brief on these same grounds. Before this Court, the State advances a few new arguments, which will require additional space.

For these reasons, Burch respectfully requests that the Court expand the word limit for his reply brief to 4,000 words.

Dated: February 24, 2021

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Ana L. Babcock State Bar No: 1063719 Attorney for the Defendant-Appellant

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